IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN SECTION OF TENNESSEE WESTERN DIVISION

| SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE TATE, JEREMY S. MELTON, ISSACCA POWELL, KEITH BURGESS, TRAVIS BOYD, TERRENCE DRAIN, and KIMBERLY ALLEN on behalf of themselves and all similarly situated persons, |) |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PLAINTIFFS, v. |) CLASS ACTION) COMPLAINT FOR) VIOLATIONS OF THE) CIVIL RIGHTS ACT OF) 1871, 42 U.S.C. § 1983,) TENNESSEE COMMON) LAW, DECLARATORY,) AND INJUNCTIVE RELIEF |
| BILL OLDHAM, in his individual capacity as former Sheriff of Shelby County, Tennessee; FLOYD BONNER, JR., in his official capacity as Sheriff of Shelby County, Tennessee; ROBERT MOORE, in his individual capacity as former Jail Director of Shelby County, Tennessee; KIRK FIELDS, in his official capacity as Jail Director of Shelby County, Tennessee; CHARLENE McGHEE, in her individual capacity as former Assistant Chief of Jail Security of Shelby County, Tennessee; REGINALD HUBBARD, in his official capacity as Assistant Chief of Jail Security of Shelby County, Tennessee; DEBRA HAMMONS, in her individual capacity as former Assistant Chief of Jail Programs of Shelby County, Tennessee; TIFFANY WARD in her official capacity as Assistant Chief of Jail Programs of Shelby County, Tennessee; SHELBY COUNTY, TENNESSEE, a Tennessee municipality; TYLER TECHNOLOGIES, INC., a foreign corporation; GLOBAL TEL*LINK CORPORATION, a foreign corporation; SOFTWARE AG USA, INC., a foreign corporation; and SIERRA-CEDAR, INC., a foreign corporation, | JURY TRIAL DEMANDED PURSUANT TO FED. R. CIV. PRO. 38(a) & (b) |
| DEFENDANTS. | ,) |

NOTICE OF NO OPPOSITION TO PLAINTIFFS' MOTION FOR LEAVE TO FILE SIXTH AMENDED CLASS ACTION COMPLAINT

COME NOW Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen, on behalf themselves and all similarly situated persons (hereinafter "the Plaintiffs"), by and through the undersigned counsel, and gives notice to the Court that, subsequent to the filing of Plaintiffs' Motion for Leave to File Sixth Amended Class Action Complaint (ECF No. 190), counsel for the following Defendants stated their clients' positions on the Plaintiffs' motion as follows:

- Counsel for Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, and Shelby County, Tennessee: Defendants do not oppose the motion.
- Counsel for Tyler Technologies, Inc.: Defendant does not oppose the motion.
- Counsel for Global Tel*Link Corporation: Defendant does not consent but will not oppose the motion.
- Counsel for Software AG USA, Inc.: Defendant does not consent but will not oppose the motion.
- Counsel for Sierra-Cedar, Inc.: Defendant does not consent but will not oppose the motion.

Respectfully submitted,

/s/ William E. Cochran, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of April, 2019, a true and correct copy of the foregoing pleading has been filed electronically with the Court's Electronic Case Filing System. Pursuant to the Court's ECF System, the following parties listed below are filing users who will receive notice of the foregoing document's filing:

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